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Question1:

Question2: It is increasingly recognized that pollinating insects play important partnership roles with producers in producing much of the nation's food and natural fiber. There is increasing evidence that pollinators are at risk. The Coevolution Institute has made recommendations under question # 4 that will affect American agriculture's ability to produce many products competitively.

Question3:

Question4: CoE SUPPORTS POLLINATOR-FRIENDLY CHANGES TO AUTHORIZING LANGUAGE FOR KEY USDA PROGRAMS

On behalf of the Coevolution Institute (CoE) I am pleased to submit comments for the public record of the U.S. Department of Agriculture (USDA) Farm Bill Forum. In brief, CoE urges USDA to ?pollinate? authorizing language for key farm bill programs through the farm bill reauthorization process in order to better address critical pollinator conservation needs. A simple language change to authorizing language for the Environmental Quality Incentive Program (EQIP) is provided as an example.

#### INTEREST OF COEVOLUTION INSTITUTE:

The mission of CoE is to catalyze stewardship of biodiversity. The Institute places a high priority on efforts to protect and enhance animal pollinators (invertebrates, birds and mammals) and their habitats in both working and wild land. More information about the Coevolution Institute may be accessed at [www.coevolution.org](http://www.coevolution.org).

CoE is a strong advocate of a collaborative approach, and is honored to have a number of beneficial pollinator partnership efforts ongoing through its management of the North American Pollinator Protection Campaign (NAPPC) with leading USDA agencies. Examples include a Memorandum of Understanding with the U.S. Forest Service (FS) and a strong working relationship with the Natural Resources Conservation Service (NRCS) and the Agricultural Research Service (ARS) and Cooperative State, Research, Extension, and Economics Service (CSREES).

Since its founding in 1999, NAPPC has been instrumental in focusing attention on the importance of pollinators and the need to protect them throughout North America. More information about NAPPC and its collaborative efforts can be found at [www.nappc.org](http://www.nappc.org).

#### POLLINATORS PLAY CRITICAL ROLE IN AGRICULTURE & ARE AT RISK:

Insect and other animal pollinators play a pivotal part in the production of an estimated one out of every three bites of food that humans eat and in the reproduction of at least 80 percent of flowering plants. The commodities produced with the help of animal pollinators

generate significant income for agricultural producers. For example, domestic honeybees pollinate an estimated \$14.6 billion worth of crops in the U.S. each year, produced on more than 2,000,000 acres. It is thus in the strong economic interest of both agricultural producers and the American consumer to help ensure a healthy, sustainable pollinator population.

Today, possible declines in the health and population of pollinators in North America and globally pose what could be a significant threat to the integrity of biodiversity, to global food webs, and to human health.

A number of pollinator species are at risk. Due to several reported factors, the number of commercially managed honeybee colonies in the U.S. has declined from 5.9 million in the 1940's to 4.3 million in 1985 and 2.5 million in 1998. All indications are the problem has worsened in recent years. About 900,000 rented colonies are employed to pollinate 400,000 acres of just one major cash crop, almonds, grown in California. At the same time, feral honeybee hives are today virtually non-existent in the U.S. due to infestations of parasitic mites. The widespread disappearance of honey bees from household gardens has been one tangible result. As one indication of the seriousness of this problem, the American Farm Bureau Federation re-activated its honey bee and apiary committee earlier this year.

As one indication of the importance of pollinators, the Boards on Agriculture and Natural Resources and on Life Sciences at the Natural Resources Council, National Academies of Science, are jointly overseeing a study currently being conducted by top scientists to evaluate scientific knowledge and understanding about the health and status of pollinators in North America. It is anticipated that the results of that study, due out in the latter part of 2006, will be instrumental in shaping future research and conservation efforts.

#### AUTHORIZING LANGUAGE FOR FARM BILL PROGRAMS CAN BE "POLLINATED" TO BETTER EQUIP USDA AGENCIES TO ADDRESS POLLINATOR NEEDS:

CoE respectfully submits that existing USDA conservation, forest management and other programs designed to work with and assist farm, ranch and forest land managers can be strengthened to better address pollinator needs by "pollinating" authorizing language in the next farm bill reauthorization through modest but significant language changes.

Farm bill conservation and other selected programs can be highly effective in addressing factors which can contribute to pollinator declines including: habitat fragmentation, loss, and degradation causing a reduction of food sources and sites for mating, nesting, roosting, and migration; improper use of pesticides and herbicides; aggressive competition from non-native species; disease, predators, and parasites; climate change; and lack of floral diversity.

Effective pollinator protection practices often overlap and complement other conservation practices, particularly those designed to improve wildlife habitat, and vice versa. In other instances, a practice designed to achieve wildlife or other conservation practices could generate significant pollinator benefits by integrating modest enhancements.

CoE applauds pollinator awareness and pollinator conservation assistance actions already being taken under existing authorities, particularly by NRCS and USFS as part of the NAPPC collaboration.

The focused objective of targeted modifications to authorizing language is to equip and direct USDA agencies to build on these early pollinator efforts and do better. Pollinators and agriculture deserve no less. This can be accomplished by inserting modest language changes as appropriate to ensure agencies have the direction and authority in implementing programs to (1) improve awareness about the importance of pollinators to agricultural producers and ecosystem health, and (2) work with farmers, ranchers and foresters in facilitating pollinator stewardship, protection and habitat conservation.

Candidate programs include EQIP, the Conservation Reserve Program (CRP), the Conservation Security Program, the Wildlife Habitat Incentives Program, the Farm and Ranchlands Protection Program, the Grasslands Reserve Program, the Wetlands Reserve Program and the Watershed Rehabilitation Program, all capably operated by the Natural Resources Conservation Service (NRCS).

Conservation assistance programs operated by the U.S. Forest Service (USFS) could be similarly augmented. The MOA between CoE and USFS identifies common ground in programs dealing with healthy forests, invasive species and resource valuation and use.

Authorities for existing research, extension and education programs assuredly offer opportunities. Through a further exchange of ideas with USDA officials, other opportunities to productively ?pollinate? programs could well be identified.

By way of specific example, the authorizing language for EQIP [P.L. 107-171, Subtitle D], additional direction and clarification of authority regarding pollinators could be provided through the insertion of ?or pollinators? at the end of Section 1240(b), (e)(2), so that it would read: ?In determining the amount and rate of incentive payments, the Secretary may accord great significance to a practice that promotes residue, nutrient, pest invasive species, or air quality management, or pollinator habitat and protection.?

If this authority is complemented by conservation assistance providers making producers aware of pollinator needs and pollinator-friendly practices, it would be clear that the statutory authority and direction exists to provide EQIP incentive payments to help producers meet part of the costs of pollinator-friendly practices.

Authorizing language making it clear that incorporating pollinator-friendly practices is an important component of criteria to be used in determining CSP payments represents another good example.

While the most obvious opportunities to improve pollinator stewardship are through USDA's conservation programs, CoE urges USDA to consider similar targeted opportunities in the research, forestry, commodity and other programs.

CoE would like to emphasize that we are NOT asking for new programs, but rather slight enhancements to existing programs as a pragmatic approach that can yield meaningful results with limited resources.

In closing, CoE respectfully submits it is vitally important to better equip relevant USDA authorities and programs through the next farm bill reauthorization to work with landowners in sustaining and enhancing pollinator species. CoE stands ready to work with USDA and the Congress toward that end as reauthorization of the farm bill moves forward, by

helping to identify and suggest appropriate targeted changes to authorizing language in key programs.

Respectfully Submitted,

R. Thomas Van Arsdall  
Consultant to CoE

Question5: The Coevolution Institute (Coe) believes that viable agricultural producers managing land and natural resources remain a lynchpin to the future of rural economies. Toward that end, CoE has recommended steps in reauthorizing the farm bill that can help producers sustain and enhance honey bees and native pollinators, for the benefit of both agricultural pollination and a healthy wildlife. The latter can also provide economic value through hunting, fishing and ecotourism. Question6: The Coevolution Institute urges that any policies directed to expand agricultural products and markets be crafted to minimize unintended consequences, such as damage to natural habitats, and in particular pollinators and their habitats that are important to the production of many commodities and to ecosystem health. Indeed, such policies should be based on a systems approach to protect and enhance natural systems, biodiversity and pollinators. These goals can and should be compatible.

CoE hopes USDA's wording in the question is not intended to imply that research should be dedicated solely to expanding agricultural products and markets. CoE respectfully submits that a vitally important research mission is to develop the science and implementation tools that through research, extension and education will equip America's farmers and ranchers to respond to conservation and environmental problems, including pollinators and their habitats. Research needs to be undertaken to support the conservation assistance programs addressed in Question #4, including what is needed to sustain pollinators and their products. A National Academies of Science study is currently underway to assess what is known and not known about the science and health of pollinators. USDA must have the science and programs developed to help farmers, ranchers and private foresters be part of the solution.